

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

HUDSON INSURANCE COMPANY, )  
a Delaware corporation, )

Plaintiff, )

v. )

DEGRAF CONCRETE CONSTRUCTION, )  
INC., NORTH LIGHT INVESTMENT )  
GROUP, INC., an Illinois corporation, )  
MICHAEL G. PIRRON, an Illinois citizen, )  
CYNTHIA PIRRON, an Illinois citizen, )  
ERNEST D. PIRRON, an Illinois citizen, )  
SHANNON D. PIRRON, an Illinois citizen, )

Defendants. )

Case No.: 1:19-cv-06445  
Honorable Elaine E. Bucklo

**HUDSON INSURANCE COMPANY'S MOTION FOR ENTRY OF JUDGMENT**

Plaintiff, Hudson Insurance Company ("Hudson"), by and through its attorneys Michael J. Weber and Krysta K. Gumbiner of Dinsmore & Shohl, LLP, hereby moves this Court for an Order of Judgment against North Light Investment Group, Inc., and DeGraf Concrete Construction, Inc., (the "Defaulted Defendants") in this matter. In support thereof, Hudson states as follows:

1. Hudson filed its Amended Complaint on September 30, 2019. [Dkt. No. 5].
2. On November 6, 2019, waivers of service were returned executed by the Defaulted Defendants and were filed with this Court. [Dkt. Nos. 8, 9, and 10]. Answers were due on or before December 2, 2019.
3. On February 24, 2020, pursuant to Federal Rule of Civil Procedure 55(a), the Clerk of the Court entered default as to the Defaulted Defendants upon affidavit of counsel as required by Rule 55(a). [Dkt. Nos. 16 and 23]. At the same time, the Clerk of the Court also entered default

against Michael G. Pirron, however, Mr. Pirron has since filed for bankruptcy; accordingly, Hudson no longer seeks an entry of judgment against Mr. Pirron.

4. Pursuant to Federal Rule of Civil Procedure 55(b)(1), Hudson now requests an entry of default judgment as its claim against the Defaulted Defendants is for a sum certain.

5. An affidavit confirming the veracity of the allegations and the sum certain due and owing by the Defaulted Defendants to Hudson is attached. *See* Exhibit A, Prove-Up Affidavit of Christopher Morkan.

6. The Defaulted Defendants currently owe Hudson \$2,205,284.46 for losses it incurred on the bonds issued on behalf of DeGraf Concrete Construction, Inc. *Id.* at ¶ 13.

7. Hudson continues to accrue losses on open matters and bond claims that are in litigation and will submit additional proofs in the event it moves for a revised judgment.

8. Also attached is an affidavit supporting the attorneys' fees incurred by Hudson, which are due and owing but have not yet been paid. *See* Exhibit B, Affidavit of Krysta Gumbiner in Support of Attorneys' Fees.

9. Accordingly, there is due and owing to Hudson by Defendants North Light Investment Group, Inc., DeGraf Concrete Construction, Inc., and Michael G. Pirron the total amount of \$2,239,118.14 comprised of the underlying losses on the bonds, together with attorneys' fees, costs and expenses.

WHEREFORE, Plaintiff Hudson Insurance Company respectfully requests that an Order of Judgment in the amount of \$2,239,118.14 be entered against Defendants North Light Investment Group, Inc., DeGraf Concrete Construction, Inc., and Michael G. Pirron and for such other relief as this Court deems just and reasonable.

Respectfully submitted,

By: /s/ Krysta K. Gumbiner

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